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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**JOINDER AND RESERVATION OF RIGHTS OF LIQUIDITY SOLUTIONS,
INC., AS ASSIGNEE, TO OBJECTION OF HITACHI CHEMICAL
(SINGAPORE) PTE. LTD. TO DEBTORS' MOTION TO CLASSIFY
RECLAMATION CLAIMS AS GENERAL UNSECURED CLAIMS**

Liquidity Solutions, Inc. ("LSI"), as assignee of certain original creditors, hereby files this joinder and reservation of rights (the "Joinder and Reservation of Rights") in connection with the Expedited Motion for Order Under 11 U.S.C. § 546(c) and Amended Reclamation Procedures Order Classifying Reclamation Claims as General Unsecured Nonpriority Claims for All Purposes [Docket No. 16663] (the "Reclamation Claim Motion") filed by the debtors and debtors-in-possession in the above-captioned cases (the "Debtors").¹ In support of its Joinder and Reservation of Rights, LSI respectfully avers as follows:

¹ Capitalized terms used but not defined herein shall have the respective meanings ascribed to such terms in the Reclamation Claim Motion.

Joinder and Reservation of Rights

1. As set forth on Exhibit A to the Reclamation Claim Motion, LSI is the holder of Reclamation Claims in agreed-upon amounts exceeding \$241,000.00.²
2. As to those Reclamation Claims held by LSI, LSI hereby joins in the arguments made in the Objection of Hitachi Chemical (Singapore) Pte. Ltd. to Debtors' Motion to Classify Reclamation Claims as General Unsecured Claims [Docket No. 16964] (the "Hitachi Objection") and respectfully requests entry of an order denying the Reclamation Claim Motion for the reasons set forth in the Hitachi Objection.
3. LSI expressly reserves its rights to supplement and amend this Joinder and Reservation of Rights, seek discovery with respect to same, introduce evidence at any hearing relating to the Reclamation Claim Motion, and to seek such other and additional relief as LSI believes is necessary to protect LSI's interest, without in any way limiting any other rights that LSI has or may have.

² LSI's Reclamation Claims included on Exhibit A to the Reclamation Claim Motion are as follows: (i) a claim originally held by S&Z Tool & Die Co. n/k/a S&Z Metalworks Ltd. in the agreed-upon amount of \$111,882.90; (ii) a claim originally held by SyZ Rolmex, S. de R.L. de C.V. n/k/a SyZ Metalworks, S. de R.L. de C.V. in the agreed-upon amount of \$4,000.00; (iii) a claim originally held by Hammond Group, Inc. in the agreed-upon amount of \$15,397.30; (iv) a claim originally held by Eaton Corporation in the agreed-upon amount of \$107,257.28; and (v) a claim originally held by Elgin Die Mold Company in the agreed-upon amount of \$2,668.00. LSI is currently reviewing its files to determine whether or not it holds any additional Reclamation Claims that are not listed on Exhibit A to the Reclamation Claim Motion, and reserves all rights in connection therewith.

WHEREFORE, LSI respectfully requests entry of an order denying the Reclamation Claim Motion and granting such other and further relief as is just and proper under the circumstances.

Dated: Hackensack, New Jersey
June 12, 2009

Respectfully submitted,
LIQUIDITY SOLUTIONS, INC.

By: 

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